

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

JOHN D. CERQUEIRA,

Plaintiff,

v.

AMERICAN AIRLINES, INC.,

Defendant.

Civil Action No. 05-11652-WGY

**PLAINTIFF'S FOURTH MOTION *IN LIMINE* TO PRECLUDE
DEFENDANT FROM OFFERING SPECULATION ABOUT POSSIBLE
BASES FOR ITS REFUSAL TO REBOOK MR. CERQUEIRA**

American Airlines (AA) refused service to Mr. Cerqueira after he was released from questioning and cleared for further travel by the Massachusetts State Police. Answer ¶¶ 23 & 37. Craig Marquis was AA's System Operations Control (SOC) manager on duty on the morning of December 28, 2003, and Mr. Marquis decided that AA would not rebook Mr. Cerqueira. Marquis Dep. 7:10-13, 9:13-14, 18:3-4 (attached as Exh. 1); Def. Resp. to Interr. No. 2 (attached as Exh. 2). Mr. Marquis does not recall the basis of his decision, and he did not prepare any written report related to the incident. Marquis Dep. 13:11-17, 24:16-18. Rhonda Cobbs was the Corporate Complaint Resolution Official (CCRO) on duty at AA's SOC on the morning of December 28, 2003. Cobbs Dep. 7:25-8-2, 11:5-10 (attached as Exh. 3). Ms. Cobbs made an entry in Mr. Cerqueira's computerized Passenger Name Record (PNR) indicating that Mr. Cerqueira was denied boarding on Flight 2237 per the SOC manager on duty because of "security issues" and that Mr. Cerqueira's ticket should be refunded and he should not be rebooked on AA. Cobbs Dep. 22:1-9, 22:23-25; Dep.

Ex. 12 (attached as Exh. 4). Ms. Cobbs does not recall what the “security issues” were that formed the basis of Mr. Marquis’s decision not to rebook Mr. Cerqueira. Cobbs Dep. 23:1-8.

Because Mr. Marquis cannot recall why he decided that Mr. Cerqueira would not be rebooked, any explanation that AA might offer for its refusal to serve Mr. Cerqueira would be speculative. Because speculation is inadmissible, AA should be precluded from offering any explanation for its decision not to rebook Mr. Cerqueira.

To the extent AA seeks to explain its refusal to rebook Mr. Cerqueira by referencing Ms. Cobb’s notation about “security issues,” it should be precluded from doing so. As a matter of law, a generalized claim that a decision was made because of non-specific “security issues” is insufficient to rebut a *prima facie* case of discrimination. *Loeb v. Textron, Inc.*, 600 F.2d 1003, 1012 n.5 (1st Cir. 1979) (requiring that defendant articulate its reasons “with some specificity”); *see also Marcano-Rivera v. Pueblo Int’l, Inc.*, 232 F.3d 245, 251 (1st Cir. 2000) (“A mere scintilla of evidence will not rise to a triable issue of fact.”) (citation omitted); *IMPACT v. Firestone*, 893 F.2d 1189, 1194 (11th Cir. 1990) (holding that where plaintiff established a *prima facie* case, conclusory statement that defendant selected the best qualified applicant was insufficient to satisfy defendant’s rebuttal burden); *Simmons v. American Airlines*, 34 Fed. Appx. 573, 575-76 (9th Cir. 2002) (holding that “American did not satisfy its burden of articulating a legitimate, non-discriminatory reason for removing [plaintiff]” from a flight, because American’s evidence was insufficient to justify its claim that it removed plaintiff for safety reasons).

JOHN D. CERQUEIRA

By his attorneys,

/s/ Michael T. Kirkpatrick

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Dated: November 17, 2006

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on November 17, 2006.

/s/ Michael T. Kirkpatrick

Michael T. Kirkpatrick

CERTIFICATE OF CONFERENCE

I hereby certify that on November 14, 2006, at 1:00 pm, I conferred by telephone with Amy Cashore Mariani, counsel for defendant, and attempted in good faith to resolve or narrow the issue presented in this motion, but the parties were unable to resolve the issue or narrow the areas of disagreement.

/s/ Michael T. Kirkpatrick

Michael T. Kirkpatrick

Exhibit 1

to

**PLAINTIFF'S FOURTH MOTION *IN LIMINE* TO PRECLUDE
DEFENDANT FROM OFFERING SPECULATION ABOUT POSSIBLE
BASES FOR ITS REFUSAL TO REBOOK MR. CERQUEIRA**

Marquis Deposition Transcript, pages 7, 9, 13, 18, & 24

<p style="text-align: right;">[5]</p> <p>1 Q About how many times?</p> <p>2 A I believe I've been deposed two other times.</p> <p>3 Q What were those cases about?</p> <p>4 A One was for 9-11 and one was for a job that I</p> <p>5 had prior to the airline business.</p> <p>6 Q I just want to quickly go over the ground rules</p> <p>7 for today. I am here to ask you some questions, to</p> <p>8 gather some information, and your job is simply to give</p> <p>9 me your best and -- and most honest answer. You are</p> <p>10 under oath as though we were in a court of law even</p> <p>11 though we're in this informal atmosphere.</p> <p>12 It's important because the court reporter</p> <p>13 is taking down my questions and your answers that we not</p> <p>14 speak at the same time, so I would just ask that you wait</p> <p>15 until I finish my question before you start to give your</p> <p>16 answers so that we get a clean transcript. Also if you</p> <p>17 don't understand one of my questions, please let me know</p> <p>18 and I'll try to repeat it or rephrase it so that you do</p> <p>19 understand it.</p> <p>20 And if Mr. Fitzhugh objects to some of my</p> <p>21 questions, those are objections for the record that we'll</p> <p>22 deal with later if we need to. But unless he instructs</p> <p>23 you not to answer, you should still try to answer my</p> <p>24 question even though he's made an objection for the</p> <p>25 record.</p>	<p style="text-align: right;">[7]</p> <p>1 A Yes.</p> <p>2 Q Other than your discussions with -- with the</p> <p>3 lawyers for American Airlines, did you talk to anybody</p> <p>4 else about today's deposition?</p> <p>5 A No.</p> <p>6 Q How long have you been employed by American</p> <p>7 Airlines?</p> <p>8 A 19 years.</p> <p>9 Q What is your current position?</p> <p>10 A I'm the operational manager in SOC, which is</p> <p>11 system operations control.</p> <p>12 Q How long have you had that job?</p> <p>13 A Approximately six years.</p> <p>14 Q Could you describe for me your duties in that</p> <p>15 position?</p> <p>16 A I represent higher management on this side of</p> <p>17 the highway to operate the published schedule efficiently</p> <p>18 and safely.</p> <p>19 Q And on a daily basis, what are the kinds of</p> <p>20 tasks that you're required to carry out in order to keep</p> <p>21 the operation operating on schedule and safely?</p> <p>22 A I take into consideration equipment that may be</p> <p>23 out of service, manpower issues, air traffic control</p> <p>24 issues, weather issues, safety issues, security issues,</p> <p>25 environmental issues.</p>
<p style="text-align: right;">[6]</p> <p>1 And I don't think it'll take us too long</p> <p>2 this afternoon, but if you need a break let me know and</p> <p>3 I'm happy to stop and take a break. But I would ask that</p> <p>4 we finish the -- the question that's pending and maybe</p> <p>5 the line of questioning and find a convenient place to</p> <p>6 take a break if we need to do that.</p> <p>7 Do you understand these instructions?</p> <p>8 A Yes, I do.</p> <p>9 Q Do you know of any reason that would prevent you</p> <p>10 today from giving me your best full and honest answers?</p> <p>11 A None.</p> <p>12 Q Did you do anything to prepare for the</p> <p>13 deposition today?</p> <p>14 A Yes, I did.</p> <p>15 Q What did you do?</p> <p>16 A I read the information that Michael had sent me,</p> <p>17 just the due diligence, so that I could prepare and give</p> <p>18 an accurate and helpful testimony.</p> <p>19 Q What were those documents, do you recall?</p> <p>20 A They were letters back and forth from different</p> <p>21 attorneys, the letter from the client, the letter back</p> <p>22 from American Airlines in response.</p> <p>23 Q Is it your understanding that those are</p> <p>24 documents that the parties have exchanged in the course</p> <p>25 of this lawsuit?</p>	<p style="text-align: right;">[8]</p> <p>1 Q How many people do you have working for you on a</p> <p>2 particular shift?</p> <p>3 A I'm the operational manager for the whole</p> <p>4 airline, so the whole airline works for me.</p> <p>5 Q Okay. What about within SOC, within your sort</p> <p>6 of work place, how many people do you typically have</p> <p>7 helping you carry out your duties?</p> <p>8 A In SOC at one time?</p> <p>9 Q Yeah.</p> <p>10 A Probably 3' or 400. SOC encompasses a lot of</p> <p>11 different departments.</p> <p>12 Q And you're in charge of all of SOC; is that</p> <p>13 right?</p> <p>14 A That's correct.</p> <p>15 Q Can you explain to me the position of CCRO and</p> <p>16 how that position interacts with the SOC manager?</p> <p>17 A The CCRO is a federally mandated position; it's</p> <p>18 corporate complaint resolution officer. Those people</p> <p>19 were trained in the laws of disabilities, and they know</p> <p>20 the rules and regulations, either the law or American</p> <p>21 Airlines guidelines and rules, and they sit two seats</p> <p>22 down from my position, very close relationship, a lot of</p> <p>23 interaction.</p> <p>24 Q And have you been trained in the same things</p> <p>25 that the CCRO's have been trained in?</p>

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<p style="text-align: right;">[9]</p> <p>1 A I have not.</p> <p>2 Q Do you supervise the CCRO?</p> <p>3 A I do.</p> <p>4 Q Prior to becoming operations manager, what other</p> <p>5 positions did you have at American Airlines? If you</p> <p>6 could just sort of work back in time, tell me the other</p> <p>7 jobs you've had.</p> <p>8 A I started as an assistant dispatcher, then</p> <p>9 became a dispatcher, then became an equipment coordinator</p> <p>10 and became a sector manager and then a center manager.</p> <p>11 Q Is there only one CCRO on duty at a time?</p> <p>12 A There is only one CCRO position.</p> <p>13 Q Were you working on December 28, 2003?</p> <p>14 A Yes, I was.</p> <p>15 Q What time did your shift start that day?</p> <p>16 A I believe 6:00 a.m., central.</p> <p>17 Q And on that day, did you become aware that there</p> <p>18 was an incident or concern with respect to Flight 2237,</p> <p>19 which was a scheduled flight from Boston Logan Airport to</p> <p>20 Ft. Lauderdale?</p> <p>21 A I do not recall.</p> <p>22 Q Is it your understanding, from the documents you</p> <p>23 reviewed, that an incident occurred that day that</p> <p>24 involved the removal of some passengers from that flight?</p> <p>25 A Yes.</p>	<p style="text-align: right;">[11]</p> <p>1 Q Do you recall whether anyone at SOC was</p> <p>2 involved, any person other than yourself, do you recall</p> <p>3 anybody else was -- was working on incidents related to</p> <p>4 this Flight 2237?</p> <p>5 MR. FITZHUGH: Objection, form.</p> <p>6 You can still answer if you --</p> <p>7 Q If you understand my question.</p> <p>8 MR. KIRKPATRICK: It wasn't a good</p> <p>9 question, but I think he understands what I'm saying.</p> <p>10 Q Was there anybody else that you can recall right</p> <p>11 now, this is the guy who handled that incident, do you</p> <p>12 recall anybody else who was directly involved in this</p> <p>13 incident?</p> <p>14 A I do not recall.</p> <p>15 Q Do you know who made the decision to have three</p> <p>16 passengers removed from Flight 2237?</p> <p>17 A Other than the information from the paperwork?</p> <p>18 Q Okay. Yeah. Setting aside anything that you've</p> <p>19 learned --</p> <p>20 A No.</p> <p>21 Q -- from the paperwork you looked at in</p> <p>22 preparation for today's deposition?</p> <p>23 A No, I do not recall.</p> <p>24 Q Okay. And I take it that you then do not recall</p> <p>25 what the specific reasons were for that decision to</p>
<p style="text-align: right;">[10]</p> <p>1 Q Other than what you've learned by preparing for</p> <p>2 this deposition, do you have any specific recollection of</p> <p>3 what you did on December 28, 2003 with respect to that</p> <p>4 flight out of Boston Logan?</p> <p>5 A No.</p> <p>6 Q Do you have any specific recollection of anybody</p> <p>7 you talked to that day, any conversations you had</p> <p>8 regarding the incident with Flight 2237?</p> <p>9 A No.</p> <p>10 Q Do you know how long you were involved in</p> <p>11 matters relating to that Flight 2237?</p> <p>12 A I don't recall.</p> <p>13 Q Do you recall how you were first made aware, I'm</p> <p>14 assuming that you were, that there was an incident with</p> <p>15 that flight?</p> <p>16 A Again, I don't recall.</p> <p>17 Q Do you have any recollection of any tasks that</p> <p>18 you carried out on December 28, 2003 with regard to the</p> <p>19 removal of passengers or denial of re-booking related to</p> <p>20 that flight?</p> <p>21 A I do not recall.</p> <p>22 Q Did you have any role in the decision to remove</p> <p>23 three passengers from Flight 2237 for questioning by law</p> <p>24 enforcement?</p> <p>25 A No, I do not recall.</p>	<p style="text-align: right;">[12]</p> <p>1 remove those passengers for questioning, am I right?</p> <p>2 A That's correct.</p> <p>3 Q On December 28, 2003, did you do anything to</p> <p>4 determine whether any of the passengers on that flight</p> <p>5 posed a security threat?</p> <p>6 A I do not recall.</p> <p>7 MR. FITZHUGH: If it'll help, we can</p> <p>8 stipulate that's the day. You can just say on the day in</p> <p>9 question.</p> <p>10 MR. KIRKPATRICK: Thank you.</p> <p>11 Q And when I say "the incident", we all know what</p> <p>12 I'm referring to.</p> <p>13 A Okay.</p> <p>14 MR. FITZHUGH: We'll so stipulate.</p> <p>15 Q Did you draw any conclusions on that day about</p> <p>16 whether John Cerqueira was a security risk?</p> <p>17 A I do not recall.</p> <p>18 Q Did you do any type of investigation about</p> <p>19 Mr. Cerqueira or the other two passengers removed from</p> <p>20 that flight?</p> <p>21 A I do not recall.</p> <p>22 Q On that date, did you learn the results of any</p> <p>23 law enforcement questioning of these passengers in</p> <p>24 Boston?</p> <p>25 A I do not recall.</p>

<p style="text-align: right;">[13]</p> <p>1 Q Did you communicate with the pilot to that 2 flight -- it was Captain John Ehlers -- did you 3 communicate with him on that day? 4 A I do not recall. 5 Q Who made the decision to deplane all the 6 passengers and re-screen them? 7 A I do not recall. 8 Q Who made the decision to have dogs brought onto 9 the plane? 10 A I do not recall. 11 Q Were you involved in making the decision that 12 the three passengers removed for questioning would not be 13 rebooked on the later American Airlines flight that day? 14 A I do not recall. 15 Q Do you know the basis for the decision not to 16 rebook those passengers on a later flight? 17 A I do not recall. 18 Q Do you recall anybody that you received 19 information from on that date about this incident? 20 A I do not recall. 21 Q Do you recall anybody that you provided 22 information to on that date about this incident? 23 A No. 24 Q Do you know when the decision was made to deny 25 further service to these three passengers?</p>	<p style="text-align: right;">[15]</p> <p>1 A Other from that documentation, I do not. 2 Q With regard to the other passengers removed from 3 that flight, and the first one who is apparently in the 4 aisle seat, Oren Ashmil, do you know how long he was 5 barred from travel on American Airlines? 6 A No. 7 Q What about for Vittorio Daniel Rokah, who was in 8 the middle seat? 9 A No. 10 Q Before preparing for today's deposition, did 11 anybody from American Airlines contact you after 12 December 28, 2003 to discuss this incident? 13 A Alec did. 14 Q That would be Alec Bramlett? 15 A That's correct. 16 Q Do you recall when that was? 17 A I do not. I was on shift; he called, asked me 18 if I recalled; I did not. 19 Q Do you have any -- do you have any -- 20 A Can I look at this? 21 MR. FITZHUGH: No. That's for the 22 stenographer, just for some names. 23 Q Did you prepare any documents or reports the day 24 of the incident regarding the incident? 25 A I do not recall.</p>
<p style="text-align: right;">[14]</p> <p>1 A No. 2 Q Do you know how the decision not to rebook these 3 passengers was communicated to American Airlines' 4 personnel in Boston? 5 A I do not recall. 6 Q Do you know whether the three individuals 7 removed from the flight are barred from further travel on 8 American Airlines? 9 A Other than from the deposition or other from the 10 paperwork? It was stated in the paperwork that they as 11 of January 6th, is that correct, 2004, they allowed that 12 person to travel; is that correct? 13 Q Okay. There are documents, yes, that -- 14 A I remember reading that in the document, -- 15 Q In preparation -- 16 A -- that's all the information I know. 17 Q Okay. Other than any review of documents you 18 did in preparation for this deposition, do you have any 19 knowledge about whether these individuals -- how long the 20 denial of service lasted? 21 MR. FITZHUGH: Objection, form. Why don't 22 you ask for each particular person? 23 MR. KIRKPATRICK: Okay. 24 Q With regard to Mr. Cerqueira, do you know how 25 long he was barred from travel on American Airlines?</p>	<p style="text-align: right;">[16]</p> <p>1 Q In preparation for this deposition, did you see 2 any documents that you had a hand in preparing? 3 A Other than the ones that were in the file, no. 4 Q Okay. Let's take a look at some documents, 5 because I'm not privy to what was in the file that you 6 looked at. But I'd like to just take a look at a series 7 of documents and, first, if you can tell me whether it's 8 one of the documents you reviewed in preparation for the 9 deposition, that would be helpful. 10 First, I'm going to show you what was 11 previously marked as Exhibit 12, and this is a passenger 12 name record for John Cerqueira. And it's five pages, so 13 if you want to take a moment to familiarize yourself with 14 it. 15 A I have seen this PNR. 16 Q When did you see it first? 17 A I saw this PNR a couple of weeks ago when I was 18 giving information on a case for Michael. 19 Q To prepare for the deposition? 20 A That's correct. 21 Q On December 28, 2003, did you add any 22 information to the detail notes for the event with this 23 ID number? 24 A No, I don't do that. 25 Q Did you instruct Rhonda Cobbs to add any</p>

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<p>[17]</p> <p>1 information to this passenger name record?</p> <p>2 A I do not recall.</p> <p>3 Q Did you instruct Nicole Traer to add any</p> <p>4 information to this passenger name record?</p> <p>5 A I do not recall.</p> <p>6 Q Mr. Marquis, if you would please turn to the</p> <p>7 second page, which is AA0024, and the -- the first entry</p> <p>8 under the -- the time stamp, correct me if I'm wrong, but</p> <p>9 I believe this means passenger denied travel on Flight</p> <p>10 2237 per SOC Craig, due to security issue. CCRO will add</p> <p>11 event number shortly. Please refund tickets due to deny.</p> <p>12 Boston customer service manager, N. Traer; is that</p> <p>13 correct?</p> <p>14 A I see that.</p> <p>15 Q Does the notation, per SOC Craig due to security</p> <p>16 issue, do you believe that that's referring to you?</p> <p>17 A Yes.</p> <p>18 Q Does this refresh your recollection at all</p> <p>19 about -- about whether you made a decision to deny</p> <p>20 boarding and refund the tickets to this passenger?</p> <p>21 A It does not.</p> <p>22 Q Looking down then, just a couple of lines below</p> <p>23 that, there's an entry with the event ID number. And it</p> <p>24 states that above passenger denied boarding Flight 2237</p> <p>25 Boston-Ft. Lauderdale per SOCMOD, due security issues</p>	<p>[19]</p> <p>1 paperwork that I've looked at that would stay in my mind.</p> <p>2 Q So, in other words, none of that has refreshed</p> <p>3 your recollection?</p> <p>4 A That's correct.</p> <p>5 Q Okay. Thank you, for -- for cutting to the</p> <p>6 chase there. I am though, just for the record, going to</p> <p>7 put you through a few more paces here.</p> <p>8 A That's fine.</p> <p>9 Q If you wouldn't mind taking a quick look at</p> <p>10 Exhibit 14, and is this a document that you reviewed in</p> <p>11 preparation for today's deposition?</p> <p>12 A I don't recall. I mean, there was a lot of --</p> <p>13 this is just general reporting for an event. There's no</p> <p>14 reason that this piece should stand out.</p> <p>15 Q Okay.</p> <p>16 A It's just reporting.</p> <p>17 Q All right. I'd like to ask you a couple of</p> <p>18 questions following up on -- on this Exhibit 14. Where</p> <p>19 it says, passengers reportedly exhibited suspicious</p> <p>20 behavior in airport towards captain, do you know</p> <p>21 specifically what behavior that was?</p> <p>22 A I do not recall.</p> <p>23 Q It -- it continues that there was some sort of</p> <p>24 suspicious behavior on the aircraft observed by Number 2</p> <p>25 flight attendant, Boston based S. Walling; do you know</p>
<p>[18]</p> <p>1 refund ticket. Do not rebook on AA. And that,</p> <p>2 apparently, was input by Rhonda Cobbs. Are you the --</p> <p>3 were you the SOC, I guess, manager on duty that day?</p> <p>4 A Yes, I was.</p> <p>5 Q Do you recall telling Rhonda Cobbs that this</p> <p>6 passenger should not be rebooked on American Airlines?</p> <p>7 A I do not recall.</p> <p>8 Q I think I can -- we're done with that exhibit.</p> <p>9 Mr. Marquis, I'm showing you what's been previously</p> <p>10 marked as Deposition Exhibit 18. If you wouldn't mind</p> <p>11 taking a look at these -- these pages that have been</p> <p>12 collected together and labeled Exhibit 18. Let me know</p> <p>13 when you got a chance to take a look at it.</p> <p>14 A Okay.</p> <p>15 Q Do the documents we've labeled as Exhibit 18,</p> <p>16 are these among the documents you reviewed in preparation</p> <p>17 for the deposition?</p> <p>18 A I'm not sure these all were here, but I</p> <p>19 remember -- I remember seeing the aircraft -- the</p> <p>20 aircraft routing, some of the crew information. I don't</p> <p>21 recall that all of these were in that paperwork.</p> <p>22 Q Do any of these exhibit pages in Exhibit 18, do</p> <p>23 any of them refresh your recollection about the incident?</p> <p>24 A They do not. Mr. Kirkpatrick, it doesn't seem</p> <p>25 to be anything spectacular or outstanding about all the</p>	<p>[20]</p> <p>1 specifically what she observed?</p> <p>2 A I do not recall.</p> <p>3 Q It also indicates that law enforcement officers</p> <p>4 removed passengers, detained, questioned, and released</p> <p>5 them. Do you recall anything about what law enforcement</p> <p>6 did with respect to these passengers?</p> <p>7 A No, I do not.</p> <p>8 Q It says, per SOCMOD passengers denied boarding</p> <p>9 and tickets refunded; do you recall any specific reasons</p> <p>10 why that decision was made?</p> <p>11 A I do not.</p> <p>12 Q It also says that security search of aircraft</p> <p>13 was performed by dogs; do you recall specifically why</p> <p>14 that was done?</p> <p>15 A I do not.</p> <p>16 Q And it says that the flight attendants were</p> <p>17 replaced due to trauma; do you recall what it was that</p> <p>18 caused that trauma?</p> <p>19 A I do not.</p> <p>20 Q Thank you. I'm handing you what's been marked</p> <p>21 as Exhibit 13. Is this one of the documents you reviewed</p> <p>22 in preparation for today's deposition?</p> <p>23 A It may have been.</p> <p>24 Q Thank you. I'm handing you what's been marked</p> <p>25 as Exhibit 11. What is Exhibit 11?</p>

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<p style="text-align: right;">[21]</p> <p>1 A It looks like a request to -- from a flight 2 service manager or person asking the flight attendants to 3 submit a report. 4 Q Do you know whether reports were solicited at 5 your instruction? 6 A I do not recall. 7 Q What would be the purpose of asking the flight 8 service people to file a report? 9 A Just for information gathering. 10 Q Who do those reports go to, in other words, any 11 reports generated, you know, by flight attendants or 12 the -- the captain relating to this incident, would those 13 ordinarily be something that would go back to SOC manager 14 on duty or -- 15 A If I requested them specifically, they come to 16 me. If I didn't, then there's a reporting system called 17 the Event Call Center and they're submitted to the Event 18 Call Center, and flight service then handles them. 19 Q If they're submitted to that Event Call Center, 20 in your position, would you ever have reason to go back 21 and review them? 22 A Hypothetically? 23 Q Yeah. 24 A If I had a question, I'd go and look at them. 25 Q Do you know whether you did, with respect to</p>	<p style="text-align: right;">[23]</p> <p>1 (Off the record from 3:01 to 3:01 p.m.) 2 Q Mr. Marquis, I'm handing you Exhibit 1, which 3 has previously been identified as a call center report of 4 Flight Attendant Walling. Have you seen this before? 5 A Yes. 6 Q In preparation for today's deposition? 7 A That's correct. 8 Q Anywhere else? 9 A No, sir. 10 Q I'm handing you what's been marked as Exhibit 5. 11 This has been previously identified as the call center 12 report of Flight Attendant Sargent. Have you seen this 13 document before? 14 A Yes. 15 Q In preparation for today's deposition? 16 A That's correct. 17 Q Anywhere else? 18 A No, sir. 19 Q I'm handing you what's been previously marked as 20 Exhibit 9, which has been identified as a call center 21 report of Flight Attendant Milencovic. Have you seen 22 this before? 23 A Yes, I have. 24 Q In preparation for today? 25 A That's correct.</p>
<p style="text-align: right;">[22]</p> <p>1 this incident, whether you went to look at any reports 2 that were filed? 3 A I do not recall. There's nothing outstanding on 4 this report, you know, it isn't a 9-11, it isn't Richard 5 Reid, it isn't, you know, a passenger being shot by FAMS. 6 There's nothing here that stands out. 7 Q All right. Okay. Thank you. 8 A You're welcome. 9 MR. FITZHUGH: FAMS means Federal Air 10 Marshals? 11 THE WITNESS: That's correct. 12 Q In preparation for today's deposition, did you 13 review call center reports filed by the flight 14 attendants? 15 A The only thing I reviewed was the paperwork that 16 I received from Michael. 17 Q Okay. I'm going to show you a series of 18 exhibits, there's about five of them. And my question is 19 going to be the same for each, and it's whether you have 20 seen it before. 21 A Seen them, okay. 22 Q And if so, whether you saw it in preparation for 23 today's deposition or somewhere else. 24 MR. FITZHUGH: Could we go off the record? 25 It may help.</p>	<p style="text-align: right;">[24]</p> <p>1 Q Anywhere else? 2 A No, sir. 3 Q I'm handing you what's been marked as Deposition 4 Exhibit 16. This has been previously identified as the 5 statement of Captain Ehlers. Have you seen this before? 6 A Yes. 7 Q In preparation for today? 8 A That's correct. 9 Q Anywhere else? 10 A No, sir. 11 Q Are there any other documents or reports that 12 were prepared contemporaneously to this incident by 13 American Airlines' personnel that you reviewed, and that 14 we haven't looked at today? 15 A No, not that I know of. 16 Q Okay. Did you prepare any written report 17 related to this incident? 18 A I did not. 19 Q Do you know whether the CCRO that day prepared 20 any written report other than the detail notes that we've 21 looked at? 22 A No. 23 Q You don't know or she did not? It wasn't a very 24 good question. 25 A The information you have there with Rhonda's</p>

Exhibit 2

to

**PLAINTIFF'S FOURTH MOTION *IN LIMINE* TO PRECLUDE
DEFENDANT FROM OFFERING SPECULATION ABOUT POSSIBLE
BASES FOR ITS REFUSAL TO REBOOK MR. CERQUEIRA**

Def. Resp. to Interr. No. 2

The foregoing General Objections shall apply to all requests, whether or not any reference is made to such objections in the defendant's response.

RESPONSES TO INTERROGATORIES

INTERROGATORY NO. 1:

Identify the person(s) who made the decision to have John D. Cerqueira removed from American Airlines flight 2237 on December 28, 2003, state the basis for the decision, and identify any other person(s) who participated in making the decision and describe their participation.

Response: Under the Federal Aviation Act, 49 U.S.C. § 44902, which affords an airline and its employees the discretion to refuse transport of a passenger who is or may be inimical to airline safety, Captain John Ehlers made an assessment that certain behavior exhibited by Mr. Cerqueira and other passengers who appeared to be traveling with him might pose a security risk. Captain Ehlers notified American Airlines' Ground Security Coordinator of these concerns, and thereafter all passengers were removed for re-screening, as was all baggage. Members of federal and state law enforcement agencies, including the Massachusetts State Police, then conducted interviews of some of the passengers, including Mr. Cerqueira. The State Police officers who were involved with the situation then notified Captain Ehlers that they were making the decision to "take this out of his hands," and detain Mr. Cerqueira for further questioning. Thus, the plaintiff was initially "removed" from the flight along with all of the other passengers as a result of Captain Ehlers' decision, but was subsequently not able to re-board the flight by virtue of the actions of the Massachusetts State Police. American Airlines also incorporates herein as a part of its response to this interrogatory the facts set forth in its December 28, 2004 Position Statement to the Massachusetts Commission Against Discrimination, as well as its Automatic Disclosures and documents attached thereto.

INTERROGATORY NO. 2:

Identify the person(s) who made the decision to refuse service to John D. Cerqueira after he was released from questioning following his removal from American Airlines flight 2237 on December 28, 2003, state the basis for the decision, and identify any other person(s) who participated in making the decision and describe their participation.

Response: On information and belief, Mr. Craig Marquis made this decision based upon information that he obtained from law enforcement officers involved with the incident, and other American Airlines personnel.

Exhibit 3

to

**PLAINTIFF'S FOURTH MOTION *IN LIMINE* TO PRECLUDE
DEFENDANT FROM OFFERING SPECULATION ABOUT POSSIBLE
BASES FOR ITS REFUSAL TO REBOOK MR. CERQUEIRA**

Cobbs Deposition Transcript, pages 7-8, 11, 22-23

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<p style="text-align: right;">[5]</p> <p>1 taken before?</p> <p>2 A No, I haven't.</p> <p>3 Q I'd like to just give you a few instructions on</p> <p>4 what we're going to do here this morning. I'm going to</p> <p>5 be asking you questions, and your job is just to give me</p> <p>6 your best answer. You are under oath as though we were</p> <p>7 in a courtroom, even though we're in this informal</p> <p>8 atmosphere of -- of a conference room. It's important</p> <p>9 that you wait for me to finish my questions before you</p> <p>10 give your answers, so that the court reporter can take</p> <p>11 down in full what everybody says. We don't want to be</p> <p>12 speaking at the same time. Also, it's important that you</p> <p>13 speak up and not just answer with a nod or a shake of the</p> <p>14 head.</p> <p>15 If you don't understand one of my</p> <p>16 questions, please let me know, just ask me to repeat or</p> <p>17 rephrase and I'll be happy to do that. I'm not trying to</p> <p>18 trick you or anything today, I just want information.</p> <p>19 And if you don't understand the question, it's important</p> <p>20 that you get a better understanding of it before you</p> <p>21 attempt to answer.</p> <p>22 If Mr. Fitzhugh objects to some of my</p> <p>23 questions, unless he instructs you not to answer, you</p> <p>24 should still answer the question to the best of your</p> <p>25 ability. The objections are to preserve that for a later</p>	<p style="text-align: right;">[7]</p> <p>1 Q Before talking to Mr. Fitzhugh today, did you</p> <p>2 discuss this deposition with anyone else?</p> <p>3 A No.</p> <p>4 Q Have you had a chance to talk to Craig Marquis</p> <p>5 about this deposition?</p> <p>6 A No.</p> <p>7 Q Did you review any documents in --</p> <p>8 A I did.</p> <p>9 Q -- preparation? What did you look at?</p> <p>10 A I don't know the titles of them all, just</p> <p>11 various letters, interrogatories. I'm -- I'm not sure of</p> <p>12 the titles of them, but probably if you showed them to me</p> <p>13 I could tell you if I've seen them before.</p> <p>14 Q Okay. Is it your understanding that those are</p> <p>15 documents that have been exchanged between the parties</p> <p>16 during this case?</p> <p>17 A Yes.</p> <p>18 Q Did you review any other documents?</p> <p>19 A No.</p> <p>20 Q Are you currently employed by American Airlines?</p> <p>21 A I am.</p> <p>22 Q What is your current position?</p> <p>23 A I'm the analyst and CCRO for system operations</p> <p>24 control.</p> <p>25 Q What is CCRO?</p>
<p style="text-align: right;">[6]</p> <p>1 time, if it's necessary, to resolve any objections, but</p> <p>2 unless there's an instruction not to answer, Mr.</p> <p>3 Fitzhugh's objection should not interfere with your</p> <p>4 giving me your best answer.</p> <p>5 If you need a break today, please let me</p> <p>6 know, and I'm happy to take a break. I would ask though</p> <p>7 that if there's a question pending, we finish that</p> <p>8 question and perhaps finish the sort of line of</p> <p>9 questioning, and then I'll find a convenient time for us</p> <p>10 to take a break. It may not be necessary for us to break</p> <p>11 at all, but we'll just see as that goes on. Do you</p> <p>12 understand these instructions?</p> <p>13 A I do.</p> <p>14 Q Do you know of any reason why you can't give me</p> <p>15 your best full and honest answers today?</p> <p>16 A No. I know of no reason.</p> <p>17 Q Okay. Very good. Did you do anything to</p> <p>18 prepare for the deposition today?</p> <p>19 A I spoke with Mr. Fitzhugh.</p> <p>20 Q For about how long?</p> <p>21 A Probably a total of, I don't know, two or three</p> <p>22 hours; longer than anticipated.</p> <p>23 Q Yes. That was -- that was today that you met</p> <p>24 with Mr. Fitzhugh?</p> <p>25 A Exactly.</p>	<p style="text-align: right;">[8]</p> <p>1 A It's stands for corporate complaint resolution</p> <p>2 official.</p> <p>3 Q And what is the relationship between CCRO and</p> <p>4 system operations control, which I guess we'll call SOC?</p> <p>5 A Are you asking me what my job function is?</p> <p>6 Q Well, is CCRO part of SOC?</p> <p>7 A CCRO is part of SOC.</p> <p>8 Q Okay. And is CCRO is just a particular job</p> <p>9 function within SOC?</p> <p>10 A It is.</p> <p>11 Q How long have you been in that position?</p> <p>12 A In that position, a little more than three</p> <p>13 years.</p> <p>14 Q Can you describe for me your duties as an</p> <p>15 analyst or CCRO?</p> <p>16 A Okay. It's actually an interchangeable desk.</p> <p>17 One day I may be working at the analyst position; one day</p> <p>18 at the CCRO position.</p> <p>19 Q I see. I didn't understand before. So you have</p> <p>20 two different positions that you --</p> <p>21 A Correct.</p> <p>22 Q -- switch between? Okay. And --</p> <p>23 A Not on the same day, but.</p> <p>24 Q Right.</p> <p>25 A Today I may go in and work one desk; the other</p>

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<p style="text-align: right;">[9]</p> <p>1 day I go in and work another desk.</p> <p>2 Q Okay. Tell me what your duties are when you're</p> <p>3 working the analyst position.</p> <p>4 A As the analyst, I help the center manager, the</p> <p>5 sector managers, in keeping track of the daily operation</p> <p>6 of the airline, compiling information, tracking flight</p> <p>7 irregularities. Also if -- if a dispatcher calls in</p> <p>8 sick, we cover the -- the sick call by calling in</p> <p>9 overtime. It's -- it's like the right-hand person to the</p> <p>10 center manager.</p> <p>11 Q Okay. And when you're working the CCRO</p> <p>12 position, what are your duties?</p> <p>13 A I act as a liaison between passenger service and</p> <p>14 SOC, responsible for passenger acceptance issues with</p> <p>15 regard to physical or medical disabilities, if there's a</p> <p>16 misconduct issue.</p> <p>17 Q And in your duties as a liaison between</p> <p>18 passenger service and SOC, what are the kinds of things</p> <p>19 that you would do, what kinds of tasks?</p> <p>20 A I'm not sure I understand that, really.</p> <p>21 Q I guess I'm just trying to get an understanding</p> <p>22 for what -- what the liaison role is. You've told me</p> <p>23 that you're a liaison between passenger service and SOC,</p> <p>24 and I'm wondering what -- what exactly do you do when</p> <p>25 you're working the CCRO position?</p>	<p style="text-align: right;">[11]</p> <p>1 staff assistant.</p> <p>2 Q So when did you start working for American</p> <p>3 Airlines?</p> <p>4 A In 1986.</p> <p>5 Q Were you working on December 28th of 2003?</p> <p>6 A I was.</p> <p>7 Q What was your position that day?</p> <p>8 A The CCRO.</p> <p>9 Q Do you remember what time your shift started?</p> <p>10 A At 6:00 o'clock in the morning.</p> <p>11 Q Who was your supervisor?</p> <p>12 A Do you mean who was the center manager?</p> <p>13 Q Yes. If that's the person that you would report</p> <p>14 to.</p> <p>15 A I don't remember, but I am assuming it was Craig</p> <p>16 Marquis from the -- all the documents that I've reviewed.</p> <p>17 Q Okay. And on December 28th, 2003, did you</p> <p>18 become aware that there was some type of incident or</p> <p>19 problem with respect to Flight 2237, a flight scheduled</p> <p>20 to leave Boston Logan Airport for Ft. Lauderdale?</p> <p>21 A Off the top of my head, no, I don't remember</p> <p>22 that.</p> <p>23 Q Do you have any recollection of being involved</p> <p>24 with incidents relating to that flight and security</p> <p>25 concerns with certain passengers?</p>
<p style="text-align: right;">[10]</p> <p>1 A Okay. The -- the CCRO is a federally mandated</p> <p>2 position in that we have to be available 24 hours a day,</p> <p>3 7 days a week whether it be on property, on an airport,</p> <p>4 or by phone; that's the position where I am able to</p> <p>5 assist people in the field, if there's questions</p> <p>6 regarding passenger acceptance or a passenger misconduct.</p> <p>7 If there's -- if there's an en route landing because a</p> <p>8 person has a medical emergency, then we assist the</p> <p>9 passengers in -- in getting on to their destination.</p> <p>10 Q I see. I think you told me that you had been in</p> <p>11 these positions for about three years --</p> <p>12 A Uh-huh.</p> <p>13 Q -- is that right? What did you do before that?</p> <p>14 A I worked in airport operations at DFW.</p> <p>15 Q How long were you in airport operations?</p> <p>16 A 10 or 12 years, just a guess.</p> <p>17 Q And was that for American Airlines?</p> <p>18 A It was.</p> <p>19 Q Did you have any positions with American before</p> <p>20 that?</p> <p>21 A I did.</p> <p>22 Q What did you do?</p> <p>23 A Clerical work or a staff assistant in employee</p> <p>24 relations. Prior to that, I was in the personnel</p> <p>25 department, and prior to that, in marketing, all as a</p>	<p style="text-align: right;">[12]</p> <p>1 A No, I don't.</p> <p>2 Q When did your shift end that day?</p> <p>3 A At 2:00 p.m.</p> <p>4 Q Did you have any role on December 28th in making</p> <p>5 the decision to remove three passengers from Flight 2237</p> <p>6 for questioning by law enforcement?</p> <p>7 A Did I have a role in it, meaning did I make some</p> <p>8 type of decision in removing those passengers?</p> <p>9 Q Either making some type of decision or providing</p> <p>10 information, doing background checks on the passengers,</p> <p>11 responding to telephone calls or communications from</p> <p>12 folks on the ground and Boston, anything like that?</p> <p>13 A I -- I don't remember doing that, but according</p> <p>14 to the documents, I was there.</p> <p>15 Q Okay. That's fine. And I certainly understand</p> <p>16 it's been some time. And if you don't remember, you</p> <p>17 don't remember. What I'd like to do is to the extent you</p> <p>18 do remember any specifics with regard to what you did or</p> <p>19 were told with regard to that flight, I'd like to walk</p> <p>20 through each of those things chronologically. Do you</p> <p>21 have any recollection of working in your position as a</p> <p>22 CCRO on December 28th, 2003, working on an issue</p> <p>23 surrounding this flight from Boston to Ft. Lauderdale?</p> <p>24 A No, I don't.</p> <p>25 Q So I take it you don't know who made the</p>

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<p style="text-align: right;">[21]</p> <p>1 Q And does SOC Craig, does that refer to Craig 2 Marquis? 3 A I believe it does. 4 Q What does the notation, CCRO will add event 5 number shortly, what does that mean? 6 A If -- if you'll look down in Line 14, there's an 7 event and a number behind it. 8 Q Yes. 9 A Which is the same, that is, the event ID number 10 underneath the words, detail note. 11 Q Okay. And did you add that number? 12 A I did. 13 Q Do you know at what time that number was added? 14 A It looks like it's 8:08 central time. 15 Q Where -- where do you see that? Okay. Line 18? 16 A Uh-huh. 17 Q I see. Were Lines 14 through 18, were they 18 added at the same time? 19 A As? 20 Q I -- 21 A Oh, yes, you mean all together? 22 Q -- that went in as one entry? 23 A Right. 24 Q Yes. So that's correct, they were added? 25 A That's correct.</p>	<p style="text-align: right;">[23]</p> <p>1 Q And it says due security issues, do you recall 2 what the security issues were? 3 A No, I don't. 4 Q You typed in the notation, do not rebook on AA; 5 is that correct? 6 A That's correct. 7 Q Do you know why? 8 A Due to security issues. 9 Q Did you make the decision that this passenger 10 should not be rebooked on American Airlines? 11 A I don't know. 12 Q Do you recall whether Craig Marquis told you 13 that he -- this passenger should not be rebooked on 14 American Airlines? 15 A I don't recall. 16 Q The indication, do not rebook on American 17 Airlines, for how long would that instruction last? 18 A Normally? 19 Q Yes. 20 A For that day. 21 Q So would this passenger have been eligible to go 22 to American Airlines, for example, the following day and 23 purchase a ticket for travel? 24 A So far as I know. 25 Q In other words, would this notation in the</p>
<p style="text-align: right;">[22]</p> <p>1 Q Okay. And you made that notation? 2 A I did. 3 Q Could you just tell me again, like you did for 4 the other entry, what -- what the various abbreviations 5 mean, if you could just read that in -- in plain English? 6 A Above passenger denied boarding Flight 2237/27, 7 Boston-Ft. Lauderdale per SOCMOD due security issues, 8 refund ticket, do not rebook on American Airlines. And 9 then that CCRO archived 28th of December at 8:08 central. 10 Q That 8:08 central -- did Boston customer service 11 manager Traer, did she make the entry above that before 12 you made the 8:08 central time entry? 13 A I can't tell from looking at this. 14 Q Okay. I was just wondering whether these 15 ordinarily, you know, are sort of chronological; that 16 anything that shows up later was added later? 17 A Not necessarily. 18 Q Okay. But the indication in Ms. Traer's 19 notation that CCRO will add event number shortly, then 20 below that that's reflecting you adding the event number; 21 is that correct? 22 A Correct. 23 Q When it -- when it says here, per SOCMOD, what 24 does that mean? 25 A System operations control manager on duty.</p>	<p style="text-align: right;">[24]</p> <p>1 passenger name record, would it have interfered with this 2 passenger's ability to travel on another -- on another 3 day, a future day on American Airlines? 4 A No. 5 Q Are some passengers denied for the travel for 6 more than the current day? 7 A I don't know. 8 Q In your experience, have you ever made a 9 notation, passenger name record, to the effect that this 10 person should not be allowed to fly ever on American 11 Airlines? 12 A No, I haven't. 13 Q Moving further down this passenger name record 14 then, can you tell me what these next entries mean 15 starting with baggage information? 16 A I believe it's -- it's bag tag numbers. 17 Q And this would have been for the December 24th 18 2003 flight? 19 A It looks like it. 20 Q And what -- the next entry under Cerqueira/John, 21 can you tell me what that entry means? 22 A It appears to be the same. It's baggage tag 23 information for Flight 514 on the 28th. I -- I'm 24 guessing. I don't know that. I -- I'm just going by 25 what it -- what the entry above that says.</p>

Exhibit 4

to

**PLAINTIFF'S FOURTH MOTION *IN LIMINE* TO PRECLUDE
DEFENDANT FROM OFFERING SPECULATION ABOUT POSSIBLE
BASES FOR ITS REFUSAL TO REBOOK MR. CERQUEIRA**

Deposition Exh. 12

Event ID: 03122856

Passenger Name Record (*PNR)

Created: 12/28/2003 08:29 Rhonda Cobbs Updated: 12/28/2003 08:29 Rhonda Cobbs

1.1 CERQUEIRA/JOHN
3 ARNK
1 AA9124Y 01MAR M AVSFSG MM1 700A 1100A
PKT/TIME LIMIT
1.T-12JUN-XTM7EAD
2.TE 0012147100338 CERQU/J XTM7W1K 1026/09MAY 1B*254202
1.TE 0012147973213 CERQU/J XTM7EAD 1125/12JUN 1B*254206
1.TK 0010494109138 CERQU/J BOS584H 0918/28DEC
VCR COUPON DATA EXISTS *VI TO DISPLAY

PHONES

1.WWW1510-579-3488-B
2.WWWSAPTECH?ALYCOS.COM-E
1.QHF510-579-3488-C/B

ADDRESS

1/JOHN CERQUEIRA
1/3675 N COUNTRY CLUB DR 120
2/AVENTURA, FL
3/33180-1731

PRICE QUOTE RECORD EXISTS - *PQS

FREQUENT TRAVELER

1.AA KDV1522 HK AA 1.1 CERQUEIRA/JOHN
2.AA KDV1522 HK AX 1.1 CERQUEIRA/JOHN

REMARKS

1.-TBMXX-ADD

1.H-TBMEDIT/49AATDS EDITOR SESSION 3
1.H-TBMEDIT/45AATDS EDITOR SESSION 4
1.H-TBMEDIT/45AATDS EDITOR SESSION 4
5.H-TBMEDIT/1 VERIFICATION EDIT/1238/24NOV
5.H-TBMEDIT/C?DEPARTURE EARLIER THAN 15 MINUTES
1.H-TBMEDIT/45AATDS EDITOR SESSION 1
1.H-TBMEDIT/1 VERIFICATION EDIT/0057/21JUL
1.H-TBMEDIT/C?DEPARTURE EARLIER THAN 15 MINUTES
10.H-TBMEDIT/45AATDS EDITOR SESSION 1
11.H-TBMEDIT/36AATDS EDITOR SESSION 5
12.H-/T?TTE11/13.00/100.00/N1.1
13.H-/T?TTE12/VCR0012147100338/C1-2
14.H-/T?DOC?VCR
15.H-/T?DLV?EMAIL?SAPTECH?ALYCOS.COM
16.H-/T?QHF ECK
17.H-/T?TBM*DS6011001850655533?03/05
18.H-/T?JOHN CERQUEIRA
19.H-BOOKING MADE VIA AMERICAN AIRLINES WEBSITE
10.H-PTICERQUEIRA/JOHN-ADT
11.XXTACTM09MAY/
12.H-TKTED PQ DELETED AND PLACED INTO HISTORY
13..

14.H-M4/PAD - NORMALIZED

15.XXAUTH/012352 *Z

16.XXTTEXTM12JUN/

17.H?EXCHANGE PROCESSED BY ETDS AUTOMATED EDITOR

18.H-/T?TBMEDIT/EMAIL SENT 1216/12JUN/TDS

19.H-TBMEDIT/1426/24NOV/SCN SENT

20.?NAME?JOHN CERQUEIRA

1 ?PNR?EJZSQY

2.?TYPE?SCN

3.?DLV?EMAIL?SAPTECH?ALYCOS.COM

4.H-/T?TBMEDIT/SCHED CHNG EMAIL SENT 1901/24NOV/TDS

5.H-ALLOWED CHANGE TO 804/5021/ PAX MISSED FLLBOS NONSTOP

6.BAG-TAG FLL890684 SCANNED 28DEC2003 0521L/BOS/SG1

7.F FLORIDA DL C626 464 67 415 0

AA 0023

15/07/2004

Detail Note

Page 2 of 5

Event ID: 03122856

Passenger Name Record (*PNR)

Created: 12/28/2003 Rhonda Cobbs Updated: 12/28/2003 Rhonda Cobbs

08:29 08:29

18.H-*****

19.H-PGR DENIED TRAVEL ON FLT 2237 PER SOC CRAIG DUE TO

10.H-SECURITY ISSUE CCRO WILL ADD EVENT NUMBER SHORTLY

11.H-PLZ REFUND TKTS DUE TO DENY BOSCSM N TRAER

12.H-*****

13.H-C-.....

14.H-C-EVENT 03122856.

15.H-C-ABOVE PAX DENIED BOARDING F2237/27 BOS-FLL

16.H-C-PER SOC MOD DUE SECURITY ISSUES. REFUND

17.H-C-TICKET...DO NOT REBOOK ON AA.

18.H-C-CCRO/R.COBBS/28DEC03/0808C.

19.H-C-.....

BAGGAGE INFORMATION

PASSENGER REROUTED

ROUTING-AA 804 LGA /AA 5021 BOS

CERQUEIRA/JOHN

30S AA 905071 - BY FLL546L 1048/24DEC03

30S AA 905072 - BY FLL546L 1048/24DEC03

ROUTING-AA 2237 FLL

CERQUEIRA/JOHN

FLL AA 890684 - BY BOS4DO1 0514/28DEC03

RECEIVED FROM - WWW?KDV1522

WWW.HDQ2EAU 0919/09MAY03 FJZSQY H

NO PGR DATA?

1 AA 804H 24DEC*FLLLGA HK1 1145A 230P/E

2 AA5021H 24DEC LGABOS*HK1 500P 615P HRS/E

5021H 24DEC LGABOS HK 4B NA 1.1 CERQUEIRA/JOHN

15H H-C-.....

15H H-C-EVENT 03122856.

15H H-C-ABOVE PAX DENIED BOARDING F2237/27 BOS-FLL

15H H-C-PER SOC MOD DUE SECURITY ISSUES. REFUND

15H H-C-TICKET...DO NOT REBOOK ON AA.

15H H-C-CCRO/R.COBBS/28DEC03/0808C.

15H H-C-.....

15 AA9124Y 01MAR AVSFSG MM/MM1 700A 1100A

1- CCRO

FTW FTW7B2L 0821/28DEC03

15H H-*****

15H H-PGR DENIED TRAVEL ON FLT 2237 PER SOC CRAIG DUE TO

15H H-SECURITY ISSUE CCRO WILL ADD EVENT NUMBER SHORTLY

15H H-PLZ REFUND TKTS DUE TO DENY BOSCSM N TRAER

15H H-*****

30S BOS584H 0801/28DEC03

15 AA2237V 28DEC BOSFLL SC/HK1 645A 1015A HRS/E

15 AA1947Y 28DEC BOSFLL NN/HK1 210P 537P/E

14G* 2237V 28DEC BOSFLL SC/HK 13A NW

30S BOS584H 0754/28DEC03

15 AA1947Y 28DEC BOSFLL NN/SS1 210P 537P/E

AA 0024

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Event ID: 03122856

Passenger Name Record (*PNR)

Cre. 12/28/2003 Rhonda Cobbs Updated: 12/28/2003 Rhonda Cobbs
08:29 08:29
BOS BOS543Q 0740/28DEC03
A5H H-FLORIDA DL C626 464 67 415 0
BOS BOS784H 0721/28DEC03
A5H H-ALLOWED CHANGE TO 804/5021/ PAX MISSED FLLBOS NONSTOP
A4G 5021H 24DEC LGABOS NN/SS 4B NA
FLL FLL546L 0947/24DEC03
KS AA2224L 24DEC FLLBOS SC/HK1 1115A 220P HRS/E
K4G* 2224L 24DEC FLLBOS SC/HK 12A NW
AS AA 804H 24DEC*FLLGA NN/SS1 1145A 230P/E
AS AA5021H 24DEC LGABOS*NN/SS1 500P 615P/E
FLL FLL546L 0947/24DEC03
A5H H-TBMEDIT/49AATDS EDITOR SESSION 3
R- TDSEDITOR/0442/25NOV/SCN
KTM XTM78CN 0446/25NOV03
A5H H-/T?TBMEDIT/SCHED CHNG EMAIL SENT 1901/24NOV/TDS
R- TDSEMAILEDIT/1901/24NOV/TDS
KTM XTM7QAD 1904/24NOV03
ITINERARY
KTM XTM48CN 1430/24NOV03
KS AA2224L 24DEC FLLBOS HK/WK1 1105A 209P HRS/E
KS AA2224L 24DEC FLLBOS SC/WK1 1124A 228P HRS/E
KS AA2237V 28DEC BOSFLL HK/WK1 750A 1125A HRS/E
KS AA2237V 28DEC BOSFLL SC/WK1 707A 1044A HRS/E
KS AA2237V 28DEC BOSFLL SC/WK1 655A 1025A HRS/E
A5H H-TBMEDIT/45AATDS EDITOR SESSION 4
A5H H-TBMEDIT/1426/24NOV/SCN SENT
BC AA2224L 24DEC FLLBOS SC/HK1 1115A 220P HRS/E
BC AA2237V 28DEC BOSFLL SC/HK1 645A 1015A HRS/E
R- TDSEDITOR/1426/24NOV/SCN
KTM TM48CN 1429/24NOV03
A5H H-TBMEDIT/45AATDS EDITOR SESSION 4
A5H H-TBMEDIT/1 VERIFICATION EDIT/1238/24NOV
A5H H-TBMEDIT/C?DEPARTURE EARLIER THAN 15 MINUTES
R- TDSEDITOR/1238/24NOV/WSC
KTM XTM5WSC 1242/24NOV03
K4G 2237V 28DEC BOSFLL HK/WK 13A NW
K4G 2237V 28DEC BOSFLL SC/SC 13A NW
IC AA2237V 28DEC BOSFLL SC/WK1 655A 1025A HRS/E
AS AA2237V 28DEC BOSFLL SC/SC1 645A 1015A HRS/E
R- SC.REAC.E05NOV03 0138/02NOV03
K4G 2224L 24DEC FLLBOS HK/WK 12A NW
K4G 2237V 28DEC BOSFLL HK/WK 13A NW
K4G 2224L 24DEC FLLBOS SC/SC 12A NW
K4G 2237V 28DEC BOSFLL SC/SC 13A NW
IC AA2224L 24DEC FLLBOS SC/WK1 1124A 228P HRS/E
AS AA2224L 24DEC FLLBOS SC/SC1 1115A 220P HRS/E
IC AA2237V 28DEC BOSFLL SC/WK1 707A 1044A HRS/E
AS AA2237V 28DEC BOSFLL SC/SC1 655A 1025A HRS/E

AA 0025

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Event ID: 03122856

Passenger Name Record (*PNR)

Cre. J: 12/28/2003 Rhonda Cobbs Updated: 12/28/2003 Rhonda Cobbs
08:28 08:29
R- SC.REAC.E22OCT03 0337/19OCT03
A5H H-TBMEDIT/45AATDS EDITOR SESSION 1
A5H H-TBMEDIT/1 VERIFICATION EDIT/0057/21JUL
A5H H-TBMEDIT/C?DEPARTURE EARLIER THAN 15 MINUTES
R- TDSEDITOR/0057/21JUL/WSC
XTM XTM5WSC 0104/21JUL03
K4G 2224L 24DEC FLLBOS HK/WK 12A NW
K4G 2237V 28DEC BOSFLL HK/WK 13A NW
A4G 2224L 24DEC FLLBOS SC/SC 12A NW
A4G 2237V 28DEC BOSFLL SC/SC 13A NW
BC AA2224L 24DEC FLLBOS HK/WK1 1105A 209P HRS/E
AS AA2224L 24DEC FLLBOS SC/SC1 1124A 228P HRS/E
BC AA2237V 28DEC BOSFLL HK/WK1 750A 1125A HRS/E
AS AA2237V 28DEC BOSFLL SC/SC1 707A 1044A HRS/E
R- SC.REAC.E23JUL03 0338/20JUL03
K8 AA2223V 28DEC BOSFLL HK/WK1 750A 1125A HRS/E
K4G* 2223V 28DEC BOSFLL HK/WK 13A NW
A5H H-TBMEDIT/45AATDS EDITOR SESSION 1
BC AA2237V 28DEC BOSFLL SC/HK1 750A 1125A HRS/E
R- TDSEDITOR/0120/25JUN/WSC
XTM XTM5WSC 0127/25JUN03
A4G 2237V 28DEC BOSFLL SC/SC 13A NW
BC AA2223V 28DEC BOSFLL HK/WK1 750A 1125A HRS/E
AS AA2237V 28DEC BOSFLL SC/SC1 750A 1125A CHG/HRS/E
R- SC.REAC.E25JUN03 0220/22JUN03
A5H H-/T?TBMEDIT/EMAIL SENT 1216/12JUN/TDS
R- TDSEMAILEDIT/1216/12JUN/TDS
XTM XTM7QAD 1222/12JUN03
K5H H-TBMEDIT/32AATDS EDITOR SESSION 3
A5 H-TBMEDIT/36AATDS EDITOR SESSION 5
R- TDSEDITOR/1125/12JUN/EVN
XTM XTM7EVN 1132/12JUN03
K5H H-TBMEDIT/41AATDS EDITOR SESSION 1
A5H H-TBMEDIT/32AATDS EDITOR SESSION 3
K7 TTEXTM12JUN/
A7 T-12JUN-XTM7EAD
R- TDSEDITOR/1119/12JUN/EAD
XTM XTM7EAD 1125/12JUN03
K5H H-TBMEDIT/TKT DRIVEN FOR 256.50/1021/09MAY
K5H H-TBMEDIT/28AATDS EDITOR SESSION 4
KN Z/33180
AW Z/33180-1731
A5H H-TBMEDIT/41AATDS EDITOR SESSION 1
A5H H-M4/PAD - NORMALIZED
R- TDSEDITOR/1104/12JUN/POS
XTM XTM7POS 1110/12JUN03
K5F -TBM*DS6011001850655533?03/05
K5F -JOHN CERQUEIRA
K5H H-/T?DOC?VCR
K5H H-/T?DLV?EMAIL?SAPTECH?ALYCOS.COM?FREE
K5H H-/T?TBMEDIT/EMAIL SENT 1045/09MAY/TDS
A9 QHF510-579-3488-C/B
K5F -TBMXX-ADD
K5H H-/T?TTE11/13.00/100.00/N1.1

AA 0026

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Event ID: 03122856

Passenger Name Record (*PNR)

Cre. : 12/28/2003 Rhonda Cobbs Updated: 12/28/2003 Rhonda Cobbs
08:29 08:29
15H H-/T?TTE12/VCR0012147100338/C1-2
15H H-/T?DOC?VCR
15H H-/T?DLV?EMAIL?SAPTECH?ALYCOS.COM
15H H-/T?QHF ECK
15H H-/T?TBM*DS6011001850655533?03/05
15H H-/T?JOHN CERQUEIRA
17 T-09MAY-XTM7W1K
17 TTEXTM12JUN/
1- JOHN
JHF QHF1ECK 1057/12JUN03
14G 2224L 24DEC FLLBOS NN/SS 12A NW
14G 2223V 28DEC BOSFLL NN/SS 13A NW
1- JOHN
JHF QHF1ECK 1053/12JUN03
18 AA4153N 20JUN TYSORD NN/HK1 226P 304P /DCAA*FJZSQY
IRS/E
18 AA4084N 22JUN ORDTYS NN/HK1 716P 945P /DCAA*FJZSQY
IRS/E
14G* 4153N 20JUN TYSORD SS/HK 8A NA
14G* 4084N 22JUN ORDTYS SS/HK 16A NAH
18 AA2224L 24DEC FLLBOS NN/SS1 1105A 209P/E
18 AA2223V 28DEC BOSFLL NN/SS1 750A 1125A/E
1- JOHN CERQUEIRA
JHF QHF1ECK 1053/12JUN03
15H H-/T?TBMEDIT/EMAIL SENT 1045/09MAY/TDS
1- TDSEMAILEDIT/1045/09MAY/TDS
17M XTM7QAD 1050/09MAY03
15H H-TBMEDIT/TKT DRIVEN FOR 256.50/1021/09MAY
15H H-TBMEDIT/28AATDS EDITOR SESSION 4
15F *-TKTED PQ DELETED AND PLACED INTO HISTORY
17 -ACXTM09MAY/
17 T-09MAY-XTM7W1K
1- TDSEDITOR/1021/09MAY/W1F
17M XTM7W1K 1026/09MAY03

AA 0027